

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

WILLIAM ALLEN NEWSOM,

Plaintiff

v.

COMMISSIONER STANLEY W. TAYLOR)

BUREAU CHIEF PAUL HOWARD,

DEPUTY WARDEN DAVID PIERCE,

CAPTAIN SAGERS, SECURITY

SUPERINTENDENT CUNNINGHAM,

FIRST CORRECTIONAL MEDICAL, LLC,)

DR. SITTA B. ALIE,

Defendants.

C.A. No. 05-673 (GMS)

JURY OF TWELVE DEMANDED

TO: William A. Newsom
S.B.I.# 257317
Delaware Correctional Center
1181 Paddock Rd.
Smyrna, DE 19977

Delaware Correctional Center
1181 Paddock Rd.
Smyrna, DE 19977
% Correctional Medical Services
1201 College Park Drive, Ste 101
Dover, DE 19904

Department of Justice
820 N. French Street, 8th Floor
Wilmington, DE 19801

PLEASE TAKE NOTICE that the undersigned will take the deposition *duces tecum* of the Records Custodian for Delaware Correctional Center relating to medical records of Albert Brown at the offices of McCullough & McKenty, P.A., 1225 N. King Street, Suite 1100, Wilmington, Delaware 19801, on Tuesday, August 22, 2006 beginning at 2:00 p.m.: **Note:** **Personal appearance is waived if the materials are received in our office prior to the date of deposition.**

McCULLOUGH & McKENTY, P.A.

/s/ Dana Spring Monzo

Daniel L. McKenty, Del. Bar No. 2689

Dana Spring Monzo, Del. Bar No. 4605

1225 N. King Street, Suite 1100

P.O. Box 397

Wilmington, DE 19899-0397

(302) 655-6749

Attorneys for Defendant First Correctional Medical

Dated: August 8, 2006

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

WILLIAM ALLEN NEWSOM,)	
)	
Plaintiff)	C.A. No. 05-673 (GMS)
)	
v.)	
)	
COMMISSIONER STANLEY W. TAYLOR))	
BUREAU CHIEF PAUL HOWARD,)	JURY OF TWELVE DEMANDED
DEPUTY WARDEN DAVID PIERCE,)	
CAPTAIN SAGERS, SECURITY)	
SUPERINTENDENT CUNNINGHAM,)	
FIRST CORRECTIONAL MEDICAL, LLC,))	
DR. SITTA B. ALIE,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I, **DANA SPRING MONZO**, hereby certify that on the 8th day of August, 2006, two
(2) copies of the attached *Notice of Records Deposition* were sent to the following via first class
mail, postage pre-paid:

TO: William A. Newsom	Delaware Correctional Center
S.B.I.# 257317	1181 Paddock Rd.
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McCULLOUGH & McKENTY, P.A.

/s/ Dana Spring Monzo

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Attorneys for Defendant First Correctional Medical